

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff

v.

TP-LINK TECHNOLOGY CO., LTD.,

Defendant

Case No. 6:20-cv-01012

Case No. 6:20-cv-01013

Case No. 6:20-cv-01014

Case No. 6:20-cv-01015

Case No. 6:20-cv-01016

Case No. 6:20-cv-01017

Case No. 6:20-cv-01018

Case No. 6:20-cv-01019

Case No. 6:20-cv-01020

Case No. 6:20-cv-01021

Case No. 6:20-cv-01022

JURY TRIAL DEMANDED

CASE READINESS STATUS REPORT

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development, and Defendant TP-Link Technologies Co., Ltd. hereby provides the following status report in advance of the Case Management hearing.

FILING AND EXTENSIONS

Plaintiff's eleven Complaints were filed on October 31, 2020. There have been no extensions.

DEFENDANT'S ANSWERS AND COUNTERCLAIMS

In lieu of answering Plaintiff's eleven Complaints, Defendant, a company located in China, moved the Court to dismiss for invalid service of process under Rule 12(b)(5) in contravention to the Hague Convention (and therefore that jurisdiction is lacking over Defendant), or in the alternative, to vacate the Court's December 7, 2020 Order on

alternative service and to quash Plaintiff's alternative service

PENDING MOTIONS

In each of the eleven cases, Defendant, made a special appearance to contest jurisdiction, and filed a motion to dismiss for invalid service of process under Rule 12(b)(5) in contravention to the Hague Convention (and therefore that jurisdiction is lacking over Defendant), or in the alternative, to vacate the Court's December 7, 2020 Order on alternative service and to quash Plaintiff's alternative service. Defendant respectfully requests expedited consideration of its motion to dismiss.

RELATED CASES

There are no other related cases in this Judicial District involving the same patents, although Plaintiff has filed eleven cases in this Judicial District involving the same parties but different patents. The eleven pending cases are listed below:

- Case No. 6:20-cv-01012 (U.S. Patent No. 7,174,180)
- Case No. 6:20-cv-01013 (U.S. Patent No. 9,226,305)
- Case No. 6:20-cv-01014 (U.S. Patent No. 7,751,423)
- Case No. 6:20-cv-01015 (U.S. Patent No. 8,094,573)
- Case No. 6:20-cv-01016 (U.S. Patent No. 8,199,636)
- Case No. 6:20-cv-01017 (U.S. Patent No. 7,965,726)
- Case No. 6:20-cv-01018 (U.S. Patent No. 7,447,767)
- Case No. 6:20-cv-01019 (U.S. Patent No. 7,333,770)
- Case No. 6:20-cv-01020 (U.S. Patent No. 8,774,790)
- Case No. 6:20-cv-01021 (U.S. Patent No. 9,548,977)
- Case No. 6:20-cv-01022 (U.S. Patent No. 7,652,988)

IPR FILINGS

There are no known IPR, CRM, or other PGR filings.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff has asserted one patent in each case. Plaintiff has not yet identified the number of asserted claims, although it asserted one claim in each Complaint. Plaintiff has not yet served its preliminary infringement contentions.

APPOINTMENT OF TECHNICAL ADVISOR

Plaintiff is unopposed to the appointment of a technical advisor to assist the Court with claim construction or other technical issues. In view of Defendant's special appearance in this case to contest jurisdiction for Plaintiff's failure to properly serve its eleven Complaints, Defendant does not take a position regarding the appointment of a technical adviser.

MEET AND CONFER STATUS

Plaintiff and Defendant conducted a meet & confer conference. Plaintiff on January 8, 2021 served jurisdictional discovery on Defendant and a third party, Foley & Lardner. Defendant submits that the purported jurisdictional discovery on its motion to dismiss for improper service does not relate to any disputed fact and therefore should not delay Court resolution of Defendant's motion to dismiss. Defendant also submits that the Court defer entry of a general schedule in the eleven cases until the motion to dismiss is decided. Plaintiff disagrees and proposes the Court set the Markman and trial date in accordance with its standard procedures. Defendant is prepared to continue to meet and confer on the jurisdictional discovery and scheduling disputes and if unable to resolve them, will contact the Court for a telephonic hearing, pursuant to the instructions set

forth in the Court's November 19, 2020 "Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases." Plaintiff has indicated to Defendant that it will respond to the motion to dismiss after Defendant and Foley respond to the jurisdictional discovery.

Dated: January 11, 2021

Respectfully submitted,

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